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21 ORACLE AMERICA, INC.

22 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 ORACLE AMERICA, INC.,
25 Plaintiff,
26 v.
27 GOOGLE INC.,
28 Defendant.

Case No. CV 10-03561 WHA

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF JOINT
LETTER RE: ORACLE'S MOTION TO
COMPEL GOOGLE TO INCLUDE
ADDITIONAL ESI CUSTODIANS**

Dept.: Courtroom 4 (Oakland)
Judge: Honorable Donna M. Ryu

1 Plaintiff Oracle America, Inc. (“Oracle”) hereby moves to file portions of the parties Joint
2 Letter Regarding Oracle’s Motion to Compel Google to Include Additional ESI Custodians
3 (“Joint Letter”) under seal pursuant to Civil Local Rules 7-11 and 79-5.

4 The Order Approving Stipulated Protective Order Subject to Stated Conditions entered in
5 this case, ECF No. 68, states that when material has been designated as “CONFIDENTIAL” or
6 “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY,” a party may not file it in the
7 public record, but must seek to file it under seal pursuant to Civil Local Rule 79-5. Stipulated
8 Protective Order § 14.4, ECF No. 66.

9 Google Inc. (“Google”) has designated certain data discussed in the Joint Letter as
10 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant
11 to the Protective Order. Therefore, Oracle moves to seal the portion of the Joint Letter that
12 discusses that data pursuant to the Protective Order.

13 Oracle states no position as to whether disclosure of these materials would cause harm to
14 Google or any third parties.

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1 Dated: November 24, 2015

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